

EXHIBIT 413

CONTROLLED DRUG ABOVE AVERAGE ORDER MONITORING PROGRAM

**ANY PERSON WHO PICKS A CONTROLLED DRUG ORDER
IS RESPONSIBLE FOR DOCUMENTING ALL REQUESTED
ORDERS THAT ARE ABOVE THE POSTED THRESHOLD**

When the pick-to-light indicates quantities greater than fifty (50) pieces of an item, (10) for tab count of 500, (5) for the tab count of 1000, the pick is automatically stopped. The associates will look up the tote number to identify the store the order is being picked for and immediately contact the pharmacy manager or pharmacist on duty to verify the ordered quantity. If the store can not be reached you will short the pick to the threshold amount and document the order in the Above Average Order Monitoring Log.

If the store verifies the quantity is correct the associate notifies them that we can not send more than 50 units. This amount was based on a [REDACTED] average movement of all controlled drugs. If the store indicates that an ordering error has occurred, the associated will short the order to the pharmacists requested quantity. In both cases the associate will document the order in the Above Average Order Monitoring Log.

When an order is being picked by the night shift personnel they will short all orders to 50, (10) for tab count of 500, (5) for tab count of 1000, and enter into the Above Average Order Monitoring Log.

When picking, if the quantity is below the threshold yet seems high or unusual the associate will:

- a. Call the store to verify the quantity is accurate, or
- b. Pick order complete and have the lead/designate/DEA Coordinator contact the store.
- c. If the quantity is an error, notify the store they will receive a credit for the units picked that were not shipped.

- d. The lead/DEA Coordinator will fill out the proper store credit forms and submit to Customer Service

All blank spaces must be filled in on the Above Average Order Monitoring Log, if the space is not applicable enter N/A.

Threshold exceptions:

If a store requests an increase to their threshold (exception) explain they will need to have their PDM (Pharmacy development manager) contact Janet Hart (GTRJGH) [REDACTED], Director Government Affairs.

- a. Ms. Hart will investigate the stores sales to determine the correct threshold.
- b. If Ms. Hart finds an increase is warranted, she will forward the proper documentation to the DEA coordinator. The DEA coordinator will:
 - i. Notify the store of their increase.
 - ii. Add the store number and item to the posted exception list.

I HAVE READ AND UNDERSTAND THE
ABOVE AVERAGE ORDER
MONITORING PROGRAM

NAME

PLEASE PRINT

SIGNATURE

DATE

REVISED 02/10

D.C. 10 DEA# 0236073